

JASON M. FRIERSON  
United States Attorney  
District of Nevada  
Nevada Bar Number 7709

PATRICK A. ROSE  
Assistant United States Attorney  
Nevada Bar Number 5109  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
Patrick.Rose@usdoj.gov  
*Attorneys for the Federal Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FULLAM ENTERPRISES dba  
THUNDERSTRUCK DANCE  
PRODUCTIONS, a Nevada Corporation,

Plaintiff,

vs.

U.S. SMALL BUSINESS  
ADMINISTRATION and ISABELLA  
CASILLAS GUZMAN, Administrator, Small  
Business Administration,

Defendants.

Case No. 2:22-cv-01032-RFB-NJK

**Stipulation and Order to  
Dismiss without Prejudice**

Plaintiff and Federal Defendants, through their undersigned attorneys, stipulate that this action, arising under the Administrative Procedure Act, 5 U.S.C. §§ 551–559, 701–706, be dismissed without prejudice, each party to bear its own attorneys’ fees and costs.

Should Plaintiff file within one year of this dismissal a new action that arises from the same events that are the subject of the instant First Amended Complaint, ECF No. 20, Federal Defendants will not assert in such new action a defense of statute of limitations.

///

///

///

///

1 Federal Defendants reserve, and may assert in such new action, all other defenses and  
2 arguments.

3 Respectfully submitted this 16th day of March 2023.

4  
5 METSCH & MASON LLP

JASON M. FRIERSON  
United States Attorney

6  
7 /s/ Michael J. Mason  
8 MICHAEL J. MASON, Esq.  
9 5060 N. Harbor Drive, Suite 275  
San Diego, CA 92106

/s/ Patrick A. Rose  
PATRICK A. ROSE  
Assistant United States Attorney  
*Attorneys for the Federal Defendants*

10 and

11 ERIC R OLSEN, Esq.  
12 GARMAN TURNER GORDON LLP  
13 7251 Amigo Street, Suite 210  
Las Vegas, Nevada 89119  
*Attorneys for Plaintiff Fullam Enterprises*

14  
15 IT IS SO ORDERED

16  
17   
18 **RICHARD E. BOULWARE, II**  
19 **United States District Court**

20 DATED this 17th day of March, 2023.  
21  
22  
23  
24  
25  
26  
27  
28